

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARIBEL RODRIGUEZ,)	
)	No. 08 C 2020
Plaintiff,)	
v.)	
)	
CITY OF CHICAGO, ILLINOIS, and)	
CHICAGO POLICE OFFICERS)	Judge Castillo
M. B. KAZARNOWICZ, Star No. 9003,)	
M. J. LOPEZ, Star No. 7433, and)	Magistrate Judge Cole
VIRGINIA WARNECKE, Beat No. 1134,)	
)	
Defendants.)	

**DEFENDANT CITY OF CHICAGO’S AGREED MOTION
FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant City of Chicago (“the City”), through its attorney Mara S. Georges, Corporation Counsel of the City of Chicago, pursuant to Federal Rule of Civil Procedure 6(b), moves this Court for an extension of time until June 2, 2008, to answer or otherwise plead to plaintiff’s complaint. In support of this motion, the City states as follows:

1. Plaintiff filed her six-count complaint on April 9, 2008. The complaint alleges federal claims under 42 U.S.C. § 1983 and Illinois state law claims against the City and three Chicago police officers.
2. Plaintiff’s complaint and summons were served on the City on or about April 18, 2008. Undersigned counsel for the City, however, was assigned to this case and received the complaint yesterday, May 5, 2008, only three days before the City is due to answer or plead in response to plaintiff’s complaint.
3. Consequently, the undersigned counsel has not yet begun the process of investigating the allegations in the plaintiff’s complaint and gathering and examining the

pertinent records.

4. Therefore, the City requests until June 2, 2008, to answer or otherwise plead in response to the complaint.

5. This is the first extension of time the City has sought in this case.

6. This motion is not brought for the purpose of delay or any other improper purpose, but so that the City can properly respond to the allegations in plaintiff's complaint.

7. Plaintiff will not be prejudiced if the requested extension of time is granted.

8. The undersigned spoke with plaintiff's counsel, Jeffrey B. Granich, yesterday, May 5, 2008, and plaintiff agrees to this motion.

For these reasons, the City requests that the Court grant the City's motion for an extension of time to and including June 2, 2008, to answer or otherwise plead to plaintiff's complaint.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel of the
City of Chicago

Dated: May 6, 2008

By: s/ Bhairav Radia
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